

Exhibit 18

3505-19

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF CALIFORNIA

3
4 IN RE: JUUL LABS, INC. Case No.
5 MARKETING, SALES PRACTICES, 19-MD-02913-WHO
6 AND PRODUCTS LIABILITY LITIGATION

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12 REMOTE VIDEOTAPED DEPOSITION OF CHERYL L. NELSON
13 SAN FRANCISCO, CALIFORNIA
14 THURSDAY, DECEMBER 16TH, 2021

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23 REPORTED BY:
24 DEBORAH HABIAN, RMR, CRR, CLR
25 JOB NO. 203990

1 Q. And are you aware of any
2 Altria-specific advertising of JUUL products?

3 A. Altria is part of JUUL now? That's my
4 understanding, that advertising from JUUL and
5 Altria would be kind of one and the same or --

6 Q. All my question is is are you aware of
7 advertisements that are specifically made by
8 Altria?

9 A. I'm not aware of that, no.

10 Q. And over your time making curriculum in
11 health education, have you included Altria as a
12 sort of lesson plan or slide deck in your work?

13 A. Of Altria? No.

14 Q. Have you discussed Altria generally as
15 a company?

16 A. I'm sure... no, not in our curriculum,
17 but I'm sure in our office.

18 Q. Do you believe that teachers are
19 listing or talking about Altria in their
20 presentations or lesson plans?

21 A. I'm not sure.

22 Q. So to the best of your knowledge, are
23 you aware of any SFUSD students receiving
24 e-mails from Altria about JUUL products?

25 A. I'm not aware of that.

1 Q. Are you aware about any students
2 receiving mailings from Altria about JUUL
3 products?

4 A. I'm not aware of that.

5 Q. Are you aware of -- are you aware of
6 students purchasing JUUL products from a store
7 that receives services from Altria?

8 A. Sorry, can you repeat that one more
9 time?

10 Q. Are you aware of students purchasing
11 JUUL products from a store that receives
12 services from Altria?

13 A. No, I'm not aware of that.

14 Q. Are you aware of students visiting
15 Altria's website?

16 A. No, I don't --

17 Q. Are you aware of students receiving
18 JUUL marketing via cigarette packaging?

19 A. I don't know.

20 Q. Are you aware of SFUSD students
21 visiting Philip Morris' website?

22 A. I'm not aware.

23 Q. Now, have you ever communicated
24 directly with Altria?

25 A. No, not to my recollection.

1 Q. Are you aware of any of your staff in
2 your department receiving communications
3 directly from Altria?

4 A. Not -- I'm not aware of that.

5 Q. Are you aware of staff at SFUSD
6 generally receiving communications directly from
7 Altria?

8 A. I'm not aware of that, no.

9 Q. Are you aware of SFUSD staff receiving
10 communications directly from Philip Morris?

11 A. I'm not aware of that.

12 Q. Are you aware of SFUSD staff receiving
13 communications directly from Altria employees?

14 A. I don't know.

15 Q. And have you ever received
16 communications directly from Philip Morris?

17 A. Not to my recollection.

18 Q. And are you aware of any services that
19 Altria provided to retail stores?

20 A. I'm not aware of.

21 MR. HINDLEY: Okay. Well, thank you,
22 Miss Nelson. That's all my questions.

23 THE WITNESS: Okay.

24 MR. CUTLER: No questions from me.

25 THE VIDEOGRAPHER: Anyone else?